

ORIGINAL EX PARTE OR LATE FILED

**MCIWORLD.COM**

**ORIGINAL**

1801 Pennsylvania Avenue, NW  
Washington, DC 20006

March 17, 2000

EX PARTE

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

RECEIVED  
MAR 17 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

CC Docket No. 98-170

Dear Ms. Salas:

On March 16, 2000, Meg Milroy and I of MCI WorldCom met with Jordan Goldstein of Commissioner Ness's office to discuss clarification of the truth-in-billing rules. The attached presentation was used to facilitate the discussion. With respect to the requirement that carriers identify those charges for which non-payment will not result in disconnection of local service (i.e., non-deniable charges), MCI WorldCom stated that LECs should be required to implement this requirement. However, MCI WorldCom emphasized that even if the Commission were to decide as a general matter that IXCs should be responsible for identifying such charges, LECs must be responsible for identifying non-deniable charges with respect to dial-around or casual calls. IXCs in large part are unable to implement the non-deniable identification requirement with respect to dial-around or casual calls.

In accordance with section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), an original and three copies are being filed with your office.

Sincerely,

  
Lori Wright

cc: Jordan Goldstein

No. of Copies rec'd otl  
List ABCDE

# Truth in Billing Reconsideration

CC Docket No. 98-170

MCI WorldCom, Inc.

March 2000

# Truth in Billing Rules

- Bill organization
  - Name of each provider for each charge
  - “Clear and conspicuous” notice of new charge
  - New provider -- one who did not bill in the previous month; describe whether IXC or LEC
- Descriptions of charges
  - “Plain language” description
- Deniable/nondeniable identification
- Clear, conspicuous disclosure of inquiry contact information

In key respects, rules require  
clarification and/or  
modification...

# Deniable/nondeniable

- FCC has overreached its jurisdiction, but if the Commission seeks to affirm this requirement
  - must clarify that it is LEC's responsibility to implement
    - IXC's have no contractual or legal right to deny local service for nonpayment of toll

# New service provider notice

- Rule provides that “billing entity” must provide clear and conspicuous notice of any change in service provider
- Dispute has emerged about which entity has responsibility for triggering this notice
  - In case of LEC-billed long distance, LEC should:
    - Review PIC information stored in its switches to determine current IXC;
    - State on bill the PIC’d carrier as of a date certain; and
    - Take steps necessary to determine if the carrier is “new.”

# New service provider notice

- FCC must clarify that non-presubscribed traffic (e.g., dial around) is specifically excluded from the notice requirement
  - There is no ongoing relationship between a dial around provider and a dial around user; a “per call” purchase decision